

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: Clearview AI, Inc. Consumer Privacy
Litigation

Civil Action File No.: 1:21-cv-00135

Judge Sharon Johnson Coleman

Magistrate Judge Maria Valdez

**PLAINTIFFS' MOTION FOR LEAVE TO FILE STIPULATED NOTICE OF
SUPPLEMENTAL INFORMATION UNDER SEAL**

Pursuant to Local Rules 5.8 and 26.2, Plaintiffs, by and through Plaintiffs' interim lead class counsel, respectfully move the Court for an Order granting leave to file the Parties' forthcoming Stipulated Notice of Supplemental Information, consisting of the full deposition transcript of Thomas Mulcaire, as well as the corresponding exhibits, under seal. In support of this motion, Plaintiffs state as follows:

1. During a hearing on May 21, 2021, the Court expressed an interest in being able to review the full deposition transcript of Thomas Mulcaire. The transcript contains information that the Clearview Defendants have designated "Confidential" or "Highly Confidential."

2. The Court has entered an Agreed Confidentiality Order (Dkt. 62). The Agreed Confidentiality Order allows the parties to designate documents containing confidential information as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" and limits the Parties' use of such information. *Id.* ¶¶ 2-7.

3. Additionally, the Agreed Confidentiality Order states that a party seeking to file a document containing information designated as "Confidential" or "Highly Confidential" must comply with Local Rule 26.2. *Id.* ¶ 9.

4. In order to preserve the confidential nature of the information and documents at issue, the Parties seek to file Mr. Mulcaire's deposition transcript under seal.

WHEREFORE, Plaintiffs respectfully move the Court for leave to file the forthcoming Notice of Supplemental Information under seal.

Dated: May 21, 2021

Respectfully submitted,

By: /s/ Scott R. Drury
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CERTIFICATE OF SERVICE

I, Scott R. Drury, an attorney, hereby certify that, on May 21, 2021, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Scott R. Drury
Interim Lead Class Counsel for Plaintiffs